

I am writing because I am a consumer who uses Speech-to-Speech. In fact, several FCC documents credit me as the developer of Speech-to-Speech.

As the FCC considers this state's application for certification, it should request additional information about how this state's Telecommunications Relay Service program intends to educate the state's speech-disabled population about Speech-to-Speech. The state's goal should be functional equivalency. Functional equivalency requires that consumers have useful information about how to use STS. Section 225 of the Communications Act requires that the FCC ensure that both "interstate and intrastate telecommunications relay services are available, to the extent possible, to . . . speech-impaired individuals."

To its credit, the FCC recently responded to this requirement by providing additional funding, on a per-minute basis, for STS providers to conduct outreach. In providing this additional funding, the FCC recognized that "potential STS users are not being made aware of this important service."

State programs can address this problem by providing additional information about STS to potential users, whether by raising the reimbursement rate for STS, or by some other effective means. In considering this state's application for certification, the FCC should weigh this state's commitment to raising awareness of STS and condition certification on this state's willingness to increase that commitment.